

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

TEVIN COLLINS,)
Plaintiff,)
v.) CIVIL ACTION NO. 2:24-cv-443
DEPUTY TRAVIS STARKS)
Individually,)
Defendant.)

PETITION FOR REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1343, 1441, and 1446, Defendant Travis Starks hereby gives notice of removal of this action from the Circuit Court of Marengo County, Alabama to the United States District Court for the Southern District of Alabama, Northern Division. As grounds, Defendant states as follows:

Commencement of the Case

This action was commenced on October 24, 2024, with the filing of the Summons and Complaint in Civil Action No. 48-CV-2024-900097.00 in the Circuit of Marengo County, Alabama. A copy of the Complaint is attached (along with all other state court pleadings, motions, orders, and other papers) as Exhibit A. A copy of the SJIS report is attached as Exhibit B.

Defendant was served with a copy of the Summons and Complaint on October 31, 2024. (Exhibit A, Doc. #5)

Jurisdictional Statement

This Court has jurisdiction of this action pursuant to 28 U.S.C. § 1331. Federal question jurisdiction exists because Plaintiff asserts a constitutional claim pursuant to 42 U.S.C. § 1983 due to an alleged illegal entry and search of his home by Defendant Deputy Sheriff Starks in violation of the Fourth Amendment. (Exhibit A, Doc. # 2)

Timeliness of Removal

This action has been timely removed, having been removed within 30 days of the service of the Complaint filed by Plaintiff. 28 U.S.C. § 1446(b).

Removal to Southern District of Alabama, Northern Division

Pursuant to 28 U.S.C. § 1441(a), this action is being removed to this Court, which embraces the place where the action is pending in state court.

Attachment of State Court Pleadings and Records

Pursuant to 28 U.S.C. § 1446(a), clear and legible copies of all process, pleadings, motions, orders, proceedings, and other papers filed in the Circuit Court of Marengo County, Alabama, and served on Defendant in this action are attached at Exhibit A.

Notice to State Court

Contemporaneously with the filing of this notice of removal in this Court, and in accordance with 28 U.S.C. § 1446(d), written notice of removal is being filed

with the Clerk of the Circuit Court of Marengo County, Alabama, and is being served on Plaintiff's counsel. A copy of same is attached hereto as Exhibit C.

No Admission by Defendant

No admission of fact, law, or liability is intended by this Notice of Removal, and all defenses, motions, and pleas are expressly reserved.

Conclusion

For the foregoing reasons, Defendant is entitled to have this cause removed from the Circuit Court of Marengo County, Alabama to the United States District Court for the Southern District of Alabama, Northern Division.

Respectfully submitted this 27th day of November, 2024.

s/Constance Caldwell Walker
CONSTANCE CALDWELL WALKER
(ASB-5510-L66C)
Attorney for Defendant Travis Starks

OF COUNSEL:

WEBB MCNEILL WALKER, PC
One Commerce Street, Suite 700
Montgomery, Alabama 36104
(334) 262-1850
cwalker@wmwfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on this the 27th day of November 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notice to the following CM/ECF participants:

Terrell E. McCants
Civil Rights Law Group, LLC
PO Box 170092
Birmingham, AL 35217
tmccants@thecivilrightslawgroup.com

s/Constance Caldwell Walker
OF COUNSEL

EXHIBIT A



State of Alabama Unified Judicial System Form AR Civ-93 Rev. 9/18	COVER SHEET CIRCUIT COURT - CIVIL CASE (Not For Domestic Relations Cases)	Case No.: 48 Date of Filing: 10/24/2024 Judge Code:
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GENERAL INFORMATION

IN THE CIRCUIT COURT OF MARENGO COUNTY, ALABAMA
TEVIN COLLINS v. TRAVIS STARKS

First Plaintiff: Business Individual
 Government Other **First Defendant:** Business Individual
 Government Other

NATURE OF SUIT: Select primary cause of action, by checking box (check only one) that best characterizes your action:

TORTS: PERSONAL INJURY <input type="checkbox"/> WDEA - Wrongful Death <input type="checkbox"/> TONG - Negligence: General <input type="checkbox"/> TOMV - Negligence: Motor Vehicle <input type="checkbox"/> TOWA - Wantonness <input type="checkbox"/> TOPL - Product Liability/AEMLD <input type="checkbox"/> TOMM - Malpractice-Medical <input type="checkbox"/> TOLM - Malpractice-Legal <input type="checkbox"/> TOOM - Malpractice-Other <input type="checkbox"/> TBFM - Fraud/Bad Faith/Misrepresentation <input type="checkbox"/> TOXX - Other: _____	OTHER CIVIL FILINGS (cont'd) <input type="checkbox"/> MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/ Enforcement of Agency Subpoena/Petition to Preserve <input checked="" type="checkbox"/> CVRT - Civil Rights <input type="checkbox"/> COND - Condemnation/Eminent Domain/Right-of-Way <input type="checkbox"/> CTMP - Contempt of Court <input type="checkbox"/> CONT - Contract/Ejectment/Writ of Seizure <input type="checkbox"/> TOCN - Conversion <input type="checkbox"/> EQND - Equity Non-Damages Actions/Declaratory Judgment/ Injunction Election Contest/Quiet Title/Sale For Division <input type="checkbox"/> CVUD - Eviction Appeal/Unlawful Detainer <input type="checkbox"/> FORJ - Foreign Judgment <input type="checkbox"/> FORF - Fruits of Crime Forfeiture <input type="checkbox"/> MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition <input type="checkbox"/> PFAB - Protection From Abuse <input type="checkbox"/> EPFA - Elder Protection From Abuse <input type="checkbox"/> QTLB - Quiet Title Land Bank <input type="checkbox"/> FELA - Railroad/Seaman (FELA) <input type="checkbox"/> RPRO - Real Property <input type="checkbox"/> WTEG - Will/Trust/Estate/Guardianship/Conservatorship <input type="checkbox"/> COMP - Workers' Compensation <input type="checkbox"/> CVXX - Miscellaneous Circuit Civil Case
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ORIGIN: <input type="checkbox"/> F <input checked="" type="checkbox"/> INITIAL FILING <input type="checkbox"/> R <input type="checkbox"/> REMANDED	<input type="checkbox"/> A <input type="checkbox"/> APPEAL FROM DISTRICT COURT	<input type="checkbox"/> O <input type="checkbox"/> OTHER
<input type="checkbox"/> T <input type="checkbox"/> TRANSFERRED FROM OTHER CIRCUIT COURT		

HAS JURY TRIAL BEEN DEMANDED?	<input type="checkbox"/> YES	<input checked="" type="checkbox"/> NO <small>Note: Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P, for procedure)</small>
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RELIEF REQUESTED:	<input checked="" type="checkbox"/> MONETARY AWARD REQUESTED	<input type="checkbox"/> NO MONETARY AWARD REQUESTED
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ATTORNEY CODE: <hr/> MCC176	10/24/2024 3:57:05 PM <hr/> Date	/s/ TERRELL E. MCCANTS ESQ. <hr/> Signature of Attorney/Party filing this form
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MEDIATION REQUESTED:	<input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> UNDECIDED	Election to Proceed under the Alabama Rules for Expedited Civil Actions: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
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IN THE CIRCUIT COURT OF MARENGO



ELECTRONICALLY FILED
10/24/2024 3:57 PM
48-CV-2024-900097.00
CIRCUIT COURT OF
MARENGO COUNTY, ALABAMA
KENNY FREEMAN, CLERK

TEVIN COLLINS

)

Plaintiff.

)

vs.

)

DEPUTY TRAVIS STARKS

)

Individually,

)

Defendant.

)

Case No.:

COMPLAINT

I. JURISDICTION

1. The jurisdiction of this court is invoked pursuant to the Fourth Amendment of the United States Constitution. This is an action brought pursuant to 42 U.S.C. Section 1983, et seq. to recover civil damages arising from the violations of the and Fourth Amendment to the U.S. Constitution. The jurisdiction for the Fourth Amendment action arise from plaintiff's facts of unlawful search.

II. PARTIES

2. Plaintiff, Tevin Collins, is a citizen of the State of Alabama and brings this lawsuit on behalf of himself.
3. The defendant, as stated in the caption of the complaint, was at all relevant times, a legal person within state of Alabama. He was a state actor during the course

of this incident as more particularly described below, in that they used the power of the state to illegally enter and search the dwelling place of Tevin Collins as he was employed by the Marengo County Sheriff Department.

III. FACTS OF THE CASE

4. On July 5, 2024, Collins was sitting in his apartment located in Marengo County, Alabama.
5. Defendant Starks entered Collins's apartment without consent or a warrant.
6. Starks began searching Collins's apartment.
7. After he had already entered and began searching Collins's apartment without consent or a warrant, he called to get a warrant.
8. Starks allegedly received a warrant and continued to search the apartment.
9. He eventually arrested Collins charging him with child endangerment, possession of marijuana, and possession of drug paraphernalia.
10. Because of Starks's illegal entry into the apartment, the charges against Collins were dismissed.

IV. PLAINTIFF'S CLAIM AGAINST STARKS FOR UNREASONABLE HOME ENTRY AND SEARCH

11. Plaintiff alleges the above facts the same as if set out herein.
12. Plaintiff alleges that Starks entered his home without consent, a warrant, or exigent circumstances.
13. Starks conducted an illegal search of his private residence.
14. Plaintiff suffered damages because of this violation of his constitutional rights.

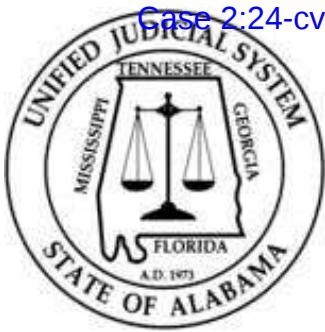
WHEREFORE, plaintiff demands judgment for compensatory and punitive damages under Section 1983, in an amount to be determined, for some or all of the

constitutional violations committed by the above-named officer as heretofore described above. Plaintiff alleges that because of the above he suffered humiliation and shame and mental distress.

/s/ Terrell E. McCants

Terrell E. McCants ASB-2299-L68M
MCC176

Civil Rights Law Group, LLC,
PO Box 170092
Birmingham, AL 35217
e-mail: tmccants@thecivilrightslawgroup.com
205-771-4999



AlaFile E-Notice

48-CV-2024-900097.00

To: TERRELL E. MCCANTS ESQ.
tmccants@thecivilrightslawgroup.com

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MARENGO COUNTY, ALABAMA

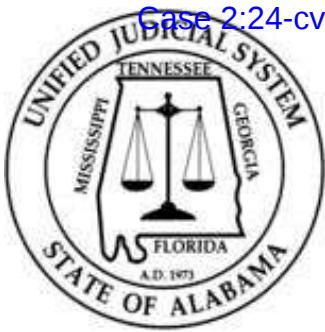
TEVIN COLLINS V. TRAVIS STARKS
48-CV-2024-900097.00

The following complaint was FILED on 10/24/2024 3:57:06 PM

Notice Date: 10/24/2024 3:57:06 PM

KENNY FREEMAN
CIRCUIT COURT CLERK
MARENGO COUNTY, ALABAMA
101 EAST COATS AVENUE
LINDEN, AL, 36748

334-295-2219
kenny.freeman@alacourt.gov



AlaFile E-Notice

48-CV-2024-900097.00

To: TRAVIS STARKS
101 DUNN STREET
LINDEN, AL, 36748

NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF MARENGO COUNTY, ALABAMA

TEVIN COLLINS V. TRAVIS STARKS
48-CV-2024-900097.00

The following complaint was FILED on 10/24/2024 3:57:06 PM

Notice Date: 10/24/2024 3:57:06 PM

Service by sheriff in 48 - MARENGO County

KENNY FREEMAN
CIRCUIT COURT CLERK
MARENGO COUNTY, ALABAMA
101 EAST COATS AVENUE
LINDEN, AL, 36748

334-295-2219
kenny.freeman@alacourt.gov

State of Alabama
Unified Judicial System
Form C-34 Rev. 7/2023

SUMMONS
- CIVIL -

Court Case Number
48-CV-2024-900097.00

IN THE CIRCUIT COURT OF MARENGO COUNTY, ALABAMA
TEVIN COLLINS V. TRAVIS STARKS

NOTICE TO: TRAVIS STARKS, 101 DUNN STREET, LINDEN, AL 36748

(Name and Address of Defendant)

THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), TERRELL E. MCCANTS ESQ.

[Name(s) of Attorney(s)]

WHOSE ADDRESS(ES) IS/ARE: PO Box 170092, Birmingham, AL 35217

[Address(es) of Plaintiff(s) or Attorney(s)]

THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:

- You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant.
- Service by certified mail of this Summons is initiated upon the written request below of pursuant to the Alabama Rules of the Civil Procedure.

10/24/2024

(Date)

/s/ KENNY FREEMAN

(Signature of Clerk)

By:

(Name)

- Certified Mail is hereby requested.

(Plaintiff's/Attorney's Signature)

RETURN ON SERVICE

Certified Mail

- Return receipt of certified mail received in this office on _____.
(Date)

Personal/Authorized

- I certify that I personally delivered a copy of this Summons and the Complaint or other document to in _____ County, Alabama on _____.
(First and Last Name of Person Served) (Name of County) (Date)

Document left:

- with above-named Defendant;
 with an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules of Civil Procedure;
 at the above-named Defendant's dwelling house or place or usual place of abode with some person of suitable age and discretion then residing therein.

Return of Non-Service

- I certify that service of process of this Summons and the Complaint or other document was refused by in _____ County, Alabama on _____ who is:
(First and Last Name of Person Served) (Name of County) (Date)
- the above-named Defendant;
 an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules of Civil Procedure;

- As a designated process server pursuant to Rule 4(i)(1)(B), Alabama Rules of Civil Procedure, I certify that I am at least 19 years of age, I am not a party to this proceeding, and I am not related within the third degree by blood or marriage to the party seeking service of process.

(Type of Process Server)

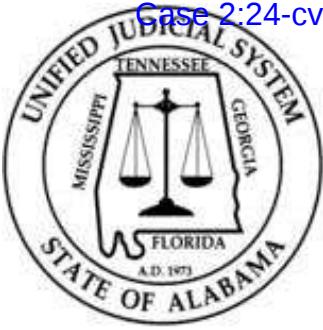
(Server's Signature)

(Address of Server)

(Badge or Precinct Number of Sheriff or Constable) (Server's Printed Name)

(Badge or Precinct Number of Sheriff or Constable) (Telephone Number of Designated Process Server)

State of Alabama Unified Judicial System Form C-34 Rev. 7/2023	SUMMONS - CIVIL -	Court Case Number 48-CV-2024-900097.00
IN THE CIRCUIT COURT OF MARENGO COUNTY, ALABAMA TEVIN COLLINS V. TRAVIS STARKS		
NOTICE TO: TRAVIS STARKS, 101 DUNN STREET, LINDEN, AL 36748 <hr/> <p style="text-align: center;">(Name and Address of Defendant)</p> <p>THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), TERRELL E. MCCANTS ESQ.</p> <hr/> <p style="text-align: center;">(Name(s) of Attorney(s))</p> <p>WHOSE ADDRESS(ES) IS/ARE: PO Box 170092, Birmingham, AL 35217 <hr/> <p style="text-align: center;">(Address(es) of Plaintiff(s) or Attorney(s))</p> <p>THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.</p> </p>		
TO ANY SHERIFF OR ANY PERSON AUTHORIZED BY THE ALABAMA RULES OF CIVIL PROCEDURE TO SERVE PROCESS:		
<input checked="" type="checkbox"/> You are hereby commanded to serve this Summons and a copy of the Complaint or other document in this action upon the above-named Defendant. <input type="checkbox"/> Service by certified mail of this Summons is initiated upon the written request below of pursuant to the Alabama Rules of the Civil Procedure.		
10/24/2024 <small>(Date)</small>	/s/ KENNY FREEMAN <small>(Signature of Clerk)</small>	By: MF <small>(Name)</small>
<input type="checkbox"/> Certified Mail is hereby requested.		
<small>(Plaintiff's/Attorney's Signature)</small>		
RETURN ON SERVICE		
<small>Certified Mail</small>		
<input type="checkbox"/> Return receipt of certified mail received in this office on _____ <small>(Date)</small>		
<small>Personal/Authorized</small>		
<input type="checkbox"/> I certify that I personally delivered a copy of this Summons and the Complaint or other document to Travis Starks in Marengo County, Alabama on 10/31/24 <small>(First and Last Name of Person Served)</small> <small>(Name of County)</small> <small>(Date)</small>		
Document left: <input type="checkbox"/> with above-named Defendant; <input type="checkbox"/> with an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules of Civil Procedure; <input checked="" type="checkbox"/> at the above-named Defendant's dwelling house or place or usual place of abode with some person of suitable age and discretion then residing therein.		
<small>Return of Non-Service</small>		
<input type="checkbox"/> I certify that service of process of this Summons and the Complaint or other document was refused by Dorothy Richardson in Marengo County, Alabama on _____ who is: <small>(First and Last Name of Person Served)</small> <small>(Name of County)</small> <small>(Date)</small>		
<input type="checkbox"/> the above-named Defendant; <input type="checkbox"/> an individual authorized to receive service of process pursuant to Rule 4(c), Alabama Rules of Civil Procedure;		
<input type="checkbox"/> As a designated process server pursuant to Rule 4(i)(1)(B), Alabama Rules of Civil Procedure, I certify that I am at least 19 years of age, I am not a party to this proceeding, and I am not related within the third degree by blood or marriage to the party seeking service of process.		
<small>(Type of Process Server)</small>	<small>(Server's Signature)</small>	<small>(Address of Server)</small>
<small>(Badge or Precinct Number of Sheriff or Constable)</small>		<small>(Server's Printed Name)</small>
<small>(Badge or Precinct Number of Sheriff or Constable)</small>		<small>(Telephone Number of Designated Process Server)</small>
Service Return Copy		
		



AlaFile E-Notice

48-CV-2024-900097.00

Judge: HON. EDDIE HARDAWAY

To: MCCANTS TERRELL EUGENE
tmccants@thecivilrightslawgroup.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF MARENGO COUNTY, ALABAMA

TEVIN COLLINS V. TRAVIS STARKS
48-CV-2024-900097.00

The following matter was served on 10/31/2024

D001 STARKS TRAVIS
Corresponding To
PROCESS SERVED

KENNY FREEMAN
CIRCUIT COURT CLERK
MARENGO COUNTY, ALABAMA
101 EAST COATS AVENUE
LINDEN, AL, 36748

334-295-2219
kenny.freeman@alacourt.gov

EXHIBIT B



County: **48** Case Number: **CV-2024-900097.00**
 Style: **TEVIN COLLINS V. TRAVIS STARKS**

PREPARED FOR: JAMIE KIDD
11/20/2024 7:50:09 AM

Real Time

Case

Case Information

County:	48-MARENGO	Case Number:	CV-2024-900097.00	Judge:	-EH:HON. EDDIE HARDAWAY
Style:	TEVIN COLLINS V. TRAVIS STARKS				
Filed:	10/24/2024	Case Status:	ACTIVE	Case Type:	CIVIL RIGHTS
Trial Type:	BENCH	Track:		Appellate Case:	0
No of Plaintiffs:	1	No of Defendants:	1		

Damages

Damage Amt:	0.00	Punitive Damages:	0.00	General Damages:	0.00
No Damages:		Compensatory Damages:	0.00		
Pay To:		Payment Frequency:		Cost Paid By:	

Court Action

Court Action Code:		Court Action Desc:		Court Action Date:	
Num of Trial days:	0	Num of Liens:	0	Judgment For:	
Disposition Date of Appeal:		Disposition Judge:	:	Disposition Type:	
Revised Judgement Date:		Minstral:		Appeal Date:	
Date Trial Began but No Verdict (TBNV1):					
Date Trial Began but No Verdict (TBNV2):					

Comments

Comment 1:
 Comment 2:

Appeal Information

Appeal Date:	Appeal Case Number:	Appeal Court:
Appeal Status:	Origin Of Appeal:	
Appeal To:	Appeal To Desc:	LowerCourt Appeal Date:
Disposition Date Of Appeal:	Disposition Type Of Appeal:	

Administrative Information

Transfer to Admin Doc Date:	Transfer Reason:	Transfer Desc:
Number of Subponeas:	Last Update: 10/28/2024	Updated By: DER

Settings

Settings

Date:	Que:	Time:	Description:
3 02/19/2025	002	01:00 PM	PTRC - PRETRIAL CONFERENCE

Parties

Party 1 - Plaintiff INDIVIDUAL - COLLINS TEVIN

Party:	C001-Plaintiff	Name:	COLLINS TEVIN	Type:	I-INDIVIDUAL
Index:	D STARKS TRAVI	Alt Name:		Hardship:	No JID: -EH
Address 1:	420 NORTH 20TH STREET			Phone:	(205) 771-4022
Address 2:	SUITE 2200				
City:	BIRMINGHAM	State:	AL	Zip:	35203-0000 Country: US
SSN:	XXX-XX-X999	DOB:		Sex:	Race:

Court Action

Court Action:		Court Action Date:	
Amount of Judgement:	\$0.00	Court Action For:	
Cost Against Party:	\$0.00	Other Cost:	\$0.00
Comment:		Date Satisfied:	
Warrant Action Date:		Arrest Date:	
		Status Description:	

Service Information

Issued:	Issued Type:	Reissue:	Reissue Type:
Return:	Return Type:	Return:	Return Type:
Served:	Service Type	Service On:	Notice of No Answer:
Answer:	Answer Type:	Notice of No Service:	Served By:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
Attorney 1	MCC176		MCCANTS TERRELL EUGENE	TMCCANTS@THECIVILRIGHTSLAWGROUP.COM	(205) 771-4999

Party 2 - Defendant INDIVIDUAL - STARKS TRAVIS**Party Information**

Party:	D001-Defendant	Name:	STARKS TRAVIS	Type:	I-INDIVIDUAL
Index:	C COLLINS TEVI	Alt Name:		Hardship:	No JID: -EH
Address 1:	101 DUNN STREET			Phone:	(334) 000-0000
Address 2:					
City:	LINDEN	State:	AL	Zip:	36748-0000 Country: US
SSN:	XXX-XX-X999	DOB:		Sex:	Race:

Court Action

Court Action:		Court Action Date:	
Amount of Judgement:	\$0.00	Court Action For:	
Cost Against Party:	\$0.00	Other Cost:	\$0.00
Comment:		Date Satisfied:	
Warrant Action Date:		Arrest Date:	
		Status Description:	

Service Information

Issued:	10/24/2024	Issued Type:	S-SHERIFF	Reissue:	Reissue Type:
Return:		Return Type:		Return:	Return Type:
Served:	10/31/2024	Service Type	V-PROCESS SERVER	Service On:	Notice of No Answer:
Answer:		Answer Type:		Notice of No Service:	Served By:

Attorneys

Number	Attorney Code	Type of Counsel	Name	Email	Phone
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Financial**Fee Sheet**

Fee Status	Admin Fee	Fee Code	Payor	Payee	Amount Due	Amount Paid	Balance	Amount Hold	Garnish Party
ACTIVE	N	CONV - CONV FEE	C001		\$14.24	\$14.24	\$0.00	\$0.00	0
ACTIVE	N	CV05 - CV OVER \$50K	C001		\$301.00	\$301.00	\$0.00	\$0.00	0
ACTIVE	N	SHER - SHER SVC	C001		\$10.00	\$10.00	\$0.00	\$0.00	0
ACTIVE	N	VADM - VADM FEE	C001		\$45.00	\$45.00	\$0.00	\$0.00	0
Total:					\$370.24	\$370.24	\$0.00	\$0.00	

Financial History

Transaction Date	Description	Disbursement Account	Transaction Batch	Receipt Number	Amount	From Party	To Party	Money Type	Admin Fee	Reason	Attorney	Operator
10/30/2024	CREDIT	CONV - CONV FEE	2025020	14161800	\$14.24	C001	000	Cash	N		MEF	
10/30/2024	RECEIPT	CV05 - CV OVER \$50K	2025020	14161900	\$301.00	C001	000	Credit Card	N		MEF	
10/30/2024	RECEIPT	SHER - SHER SVC	2025020	14162000	\$10.00	C001	000	Credit Card	N		MEF	
10/30/2024	RECEIPT	VADM - VADM FEE	2025020	14162100	\$45.00	C001	000	Credit Card	N		MEF	

Case Action Summary

Date:	Time	Code	Comments	Operator
10/24/2024	3:57 PM	ECOMP	COMPLAINT E-FILED.	MCC176
10/24/2024	3:57 PM	FILE	FILED THIS DATE: 10/24/2024 (AV01)	AJA
10/24/2024	3:57 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	AJA
10/24/2024	3:57 PM	ASSJ	ASSIGNED TO JUDGE: EDDIE HARDAWAY (AV01)	AJA
10/24/2024	3:57 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	AJA
10/24/2024	3:57 PM	TDMN	BENCH/NON-JURY TRIAL REQUESTED (AV01)	AJA
10/24/2024	3:57 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	AJA
10/24/2024	3:57 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	AJA
10/24/2024	3:57 PM	C001	C001 PARTY ADDED: COLLINS TEVIN (AV02)	AJA
10/24/2024	3:57 PM	C001	INDIGENT FLAG SET TO: N (AV02)	AJA
10/24/2024	3:57 PM	C001	LISTED AS ATTORNEY FOR C001: MCCANTS TERRELL EUGE	AJA
10/24/2024	3:57 PM	C001	C001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
10/24/2024	3:57 PM	D001	D001 PARTY ADDED: STARKS TRAVIS (AV02)	AJA
10/24/2024	3:57 PM	D001	INDIGENT FLAG SET TO: N (AV02)	AJA
10/24/2024	3:57 PM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	AJA
10/24/2024	3:57 PM	D001	SHERIFF ISSUED: 10/24/2024 TO D001 (AV02)	AJA
10/24/2024	3:57 PM	D001	D001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
10/28/2024	9:17 AM	DAT3	FOR: PRETRIAL CONFERENCE ON 02/19/2025 @ 0100P	DER
11/5/2024	8:31 AM	D001	SERVICE OF PROCESS SERVE ON 10/31/2024 FOR D001	MEF
11/5/2024	8:32 AM	ESERC	SERVICE RETURN	MEF

Images

Date:	Doc#	Title	Description	Pages
10/24/2024 3:57:06 PM	1	CIVIL_COVER_SHEET	CIRCUIT COURT - CIVIL CASE	1
10/24/2024 3:57:07 PM	2	COMPLAINT		3
10/24/2024 3:58:01 PM	3	COMPLAINT - TRANSMITTAL	E-NOTICE TRANSMITTALS	2

10/24/2024 3:58:02 PM	4	COMPLAINT - SUMMONS	E-NOTICE TRANSMITTALS	1
11/5/2024 8:32:30 AM	5	SERVICE RETURN	SERVICE RETURN	1
11/5/2024 8:32:34 AM	6	SERVICE RETURN - TRANSMITTAL	E-NOTICE TRANSMITTALS	1



END OF THE REPORT

EXHIBIT C

IN THE CIRCUIT COURT OF MARENGO COUNTY, ALABAMA

TEVIN COLLINS)
)
Plaintiff,)
)
v.) **CV-2024-900097.00**
)
DEPUTY TRAVIS STARKS)
Individually,)
)
Defendant.)

NOTICE OF FILING NOTICE OF REMOVAL

PLEASE TAKE NOTICE that a Notice of Removal of the above-styled action from the Circuit Court of Marengo County, Alabama to the United States District Court for the Southern District of Alabama, Northern Division, a copy of which is attached hereto, was duly filed on November 27, 2024, in the office of the Clerk of the United States District Court for the Southern District of Alabama, Northern Division.

Respectfully submitted this 27th day of November 2024.

s/CONSTANCE CALDWELL WALKER
CONSTANCE CALDWELL WALKER (WAL114)
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cwalker@wmwfirm.com

CERTIFICATE OF SERVICE

I hereby certify that on November 27, 2024, I electronically filed the foregoing with the Clerk of the Court using the Alafile system which will send notification of such filing to the following:

Terrell E. McCants
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Birmingham, AL 35217
tmccants@thecivilrightslawgroup.com

s/Constance Caldwell Walker
OF COUNSEL